

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736  
Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001  
Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0229  
Comment submitted by David Black, President & CEO, Harrisburg Regional Chamber & Capital Region Economic Development Corporation (CREDC), Harrisburg, Pennsylvania

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## Submitter Information

**Submitter's Representative:** Rachel Cornman  
**Organization:** Harrisburg Regional Chamber & Capital Region Economic Development Corporation (CREDC)

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## General Comment

The Harrisburg Regional Chamber & Capital Region Economic Development Corporation (CREDC) officially states its opposition to the Environmental Protection Agency's proposed 'backstop' TMDL. The Chamber & CREDC fully supports the clean-up of nutrients and sediment pollution from the Chesapeake Bay, however, the EPA's proposed backstop TMDL would result in a significant economic impact on sewage treatment plants and ratepayers, which include the business community and citizens of the Commonwealth. As a regional business association and economic development organization, with nearly 1500 members throughout Cumberland, Dauphin and Perry Counties, we fully realize the potential negative impact these regulations may have on our community.

The Chamber & CREDC's Environmental & Energy Committee has fully vetted EPA's backstop TMDL and has studied the Chesapeake Bay issue for several years. The committee believes that Pennsylvania's Department of Environmental Protection's Phase 1 Watershed Implementation Plan (WIP) is adequate to address the concerns of EPA regarding Pennsylvania's responsibility to the Chesapeake Bay. The Chamber & CREDC believe that a robust nutrient trading program is needed and DEP's WIP fully addresses the necessary steps for Pennsylvania to be compliant. The committee also believes that the EPA's backstop TMDL will only cause more economic distress on the business community and ratepayers across the state.

Please note attached is a position statement by the Harrisburg Regional Chamber & CREDC that officially opposes the EPA's backstop TMDL and supports DEP's Watershed Implementation Plan.

If you have any questions or concerns regarding our position statement, please contact Rachel Cornman, Government Relations Manager for the Harrisburg Regional Chamber & CREDC, at (717) 213-5041 or email [rcornman@hbgrc.org](mailto:rcornman@hbgrc.org).

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## Attachments

- EPA-R03-OW-2010-0736-0229.1:** Comment attachment submitted by David Black, President & CEO, Harrisburg Regional Chamber & Capital Region Economic Development Corporation (CREDC), Harrisburg, Pennsylvania
- EPA-R03-OW-2010-0736-0229.2:** Comment attachment submitted by David Black, President & CEO, Harrisburg Regional Chamber & Capital Region Economic Development Corporation (CREDC), Harrisburg, Pennsylvania